

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE: STERICYCLE, INC., STERI-
SAFE CONTRACT LITIGATION**

No. 13 C 5795
MDL No. 2455

Judge Milton Shadur

JOINT PROPOSED DISCOVERY PLAN

The parties met and conferred and agree, subject to the Court's approval, to the following discovery-related items:

1. **Search Terms for Electronically-Stored Information.** The parties are conferring regarding proposed search terms and queries and an appropriate ESI search process. If the parties have any pending disputes regarding search terms and/or the search process that require consideration by the Court at the status conference scheduled for January 8, 2014, those disputes must be submitted to the Court by motion filed on or before January 3, 2014. Disputes arising after January 8, 2013, regarding search terms and/or the search process may also be submitted by motion to the Court for resolution.
2. **Custodians and Sources to Be Searched for Documents.** The parties are conferring regarding custodians and sources to be searched by Defendant. If the parties are unable to reach agreement, they will submit any disputes regarding custodians and sources to the Court by January 3, 2014, for consideration at the status conference scheduled for January 8, 2014.

3. **Privilege Logs.** The parties agree to produce privilege logs, if applicable, 90 days after the first production of documents and/or information in response to a party's written requests pursuant to Federal Rule of Civil Procedure 34. For any subsequent productions, privilege logs will be produced, if applicable, every 90 days until production is complete.
4. **Limit on Number of Interrogatories.** The parties agree that the presumptive limits in the Federal Rules of Civil Procedure shall apply.
5. **Fact Witness Depositions.** The parties agree that Plaintiffs may take up to 25 depositions of fact witnesses.

Dated: November 19, 2013

Respectfully Submitted,

For Plaintiffs:

For Defendant:

By: /s/ Elizabeth A. Fegan

Steve W. Berman
Jeffrey T. Sprung
Garth Wojtanowicz
HAGENS BERMAN SOBOL SHAPIRO LLP
1918 Eighth Ave., Suite 3300
Seattle, WA 98101
Telephone: (206) 623-7292
Facsimile: (206) 623-0594
E-mail: steve@hbsslaw.com
E-mail: jeffs@hbsslaw.com
E-mail: garthw@hbsslaw.com

Elizabeth A. Fegan
Daniel J. Kurowski
Thomas Ahlering
HAGENS BERMAN SOBOL SHAPIRO LLP
1144 W. Lake Street – Suite 400
Oak Park, IL 60301
Telephone: (708) 628-4949
Facsimile: (708) 628-4950
E-mail: beth@hbsslaw.com
E-mail: dank@hbsslaw.com
E-mail: toma@hbsslaw.com

By: /s/ Raymond J. Etcheverry

Raymond J. Etcheverry (admitted pro hac vice)
Mark Glick (admitted pro hac vice)
Juliette P. White (admitted pro hac vice)
Cory Sinclair (admitted pro hac vice)
PARSONS BEHLE & LATIMER
Salt Lake City, Utah 84111
(801) 532-1234
E-mail: retcheverry@parsonsbehle.com
E-mail: mglick@parsonsbehle.com
E-mail: jwhite@parsonsbehle.com
E-mail: csinclair@parsonsbehle.com

Paul E. Chronis
Elinor L. Hart
DUANE MORRIS LLP
190 S. LaSalle Street, Suite 3700
Chicago, Illinois 60603
(312) 499-6700
E-mail: PEChronis@duanemorris.com
E-mail: EHart@duanemorris.com

CERTIFICATE OF FILING AND SERVICE

I hereby certify that on this 19th day of November, 2013, a true and correct copy of the foregoing was filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Elizabeth A. Fegan

Elizabeth A. Fegan